UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA MIAMI DIVISION

CIVIL ACTION NO. 0:25-cv-61308-RLR

SHAWN SILVER,

Plaintiff,

v.

SPILL THE TEA, INC., a Delaware corporate, AWDTSG, Inc., a Delaware corporation, TRANSGLOBAL ASSETS INC., et al.

Defendant(s).

UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT

Defendant Meta Platforms, Inc. ("Meta"), by and through its undersigned counsel, hereby respectfully moves the Court to extend the time for Meta to respond to the Complaint in this action until August 25, 2025, without waiving any defenses, rights, or other matters that may be presented under Federal Rule of Civil Procedure 12(b) or any other rule or law. Plaintiff consents to this Motion.

Meta respectfully states the following as good cause in support of its request for an extension of time:

- 1. Counsel for the parties have met and conferred regarding this motion, and Plaintiff consents to the relief requested herein.
- 2. The Complaint in this action was filed on June 27, 2025. Meta was served with the Complaint and Summons on July 14, 2025. Accordingly, Meta's response to the Complaint is currently due on August 4, 2025.

3. Meta only recently retained counsel in this action and requires additional time in

which to evaluate the pleadings and respond to the Complaint.

4. A 21-day extension of the time for Meta to respond to the Complaint, from August

4, 2025 until August 25, 2025, will not cause prejudice or unduly delay the litigation. Meta is

making this request for an extension of time prior to expiration of the time in which Meta is required

to file a response to the Complaint and the request is made in good faith.

5. District courts have broad discretion in managing their cases, and motions

requesting additional time are normally granted absent bad faith or prejudice. See Chrysler Int'l

Corp. v. Chemaly, 280 F.3d 1358, 1360 (11th Cir. 2002).

For the foregoing reasons, Meta respectfully moves that the date for filing any response to

the Complaint in this action, including by answer, motion, or other pleading of any type, be

extended until August 25, 2025.

Southern District of Florida Local Rule 7.1 Certification

Pursuant to Local Rule 7.1(a)(3), on July 22, 2025, counsel for Meta conferred with counsel

for Plaintiff via email regarding the extension requested herein. Plaintiff does not oppose the relief

requested.

Date: July 25, 2025

Respectfully submitted,

/s/Diana Marie Fassbender

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